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To: DES SBCC <sbcc@des.wa.gov>
Subject: Members of the Washington State Building Code Council

External Email

Good Morning Members of the Building Code Council,

I'm writing to you today in regards to proposals 21-GP1-103, 136 and 179. As you know, these codes will ban the use of natural gas in all new and major retrofits of existing commercial buildings.

According to the state's own emission inventory, the commercial use of natural gas accounts for less than 4% of the state's emission and the implementation of these code changes will force a significantly greater load onto our already fragile electrical grid (See Attached Letter).

The space heating proposal eliminates the choice of highly efficient and cost-effective gas options as it mandates only one energy choice. The innovations in technology around the use of gas for space heating will be lost as this technology could provide energy savings and emissions reductions equal to or better than electricity in the future.

The water heating proposal will impose higher capital and operating costs that will disproportionately affect small businesses and low-income housing, bringing into question issues of social equity. Currently, the number of manufacturers of the commercial grade equipment that is needed is limited so the demand for this equipment will artificially raise prices.

The exception that allows for gas appliances in certain situations requires an electrical receptacle for future transition which will increase the design and construction costs.

I hope that you would take these things into consideration when looking at these code changes. Natural gas and our technology around using this source of energy is evolving each day to be less emitting and should be a part of a balanced mix of energy in the future.

Thanks for your time and work on these important issues.